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6 *Claimant and*

7 *Party to California Public Utilities Commission Proceeding I.19-09-016 to Consider the Ratemaking*
8 *and Other Implications of a Proposed Plan for Resolution of Voluntary Case filed by Pacific Gas and*
9 *Electric Company, pursuant to Chapter 11 of the Bankruptcy Code, in the United States Bankruptcy*
10 *Court, Northern District of California, San Francisco Division, In re Pacific Gas and Electric*
11 *Corporation and Pacific Gas and Electric Company, Case No. 19- 30088.*

12 *Party to California Public Utilities Commission Proceeding I.15-08-019 to Determine whether*
13 *Pacific Gas and Electric Company and PG&E's Corporation's Organizational Culture and*
14 *Governance Prioritizes Safety*

15 **UNITED STATES BANKRUPTCY COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 In re:

19 PG&E CORPORATION,

20 -and-

21 PACIFIC GAS AND ELECTRIC
22 COMPANY,

23 Debtors.

- 24 ☐ Affects PG&E Corporation
25 ☐ Affects Pacific Gas and Electric Company
26 ☒ Affects both Debtors

27 * *All papers shall be filed in the lead case,*
28 *No. 19-30088 (DM)*

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**DECLARATION OF WILLIAM B.
ABRAMS IN SUPPORT OF
EX PARTE MOTION OF WILLIAM B.
ABRAMS PURSUANT TO B.L.R.
9006-1 REQUESTING ORDER
SHORTENING TIME FOR HEARING
ON WILLIAM B. ABRAMS MOTION
TO DESIGNATE IMPROPERLY
SOLICITED VOTES PURSUANT TO
11 U.S.C. §§ 1125(B) AND 1126(E)
AND BANKRUPTCY RULE 2019**

Related Documents: Dkt. 6799, Dkt. 6801,
Dkt. 6891, Dkt. 6944, Dkt. 6946

1 I, William B. Abrams, pursuant to section 1746 of title 28 of the United States Code,
2 hereby declare under penalty of perjury that the following is true and correct to the best of my
3 knowledge, information, and belief:
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5 1. I am a claimant and a PG&E Fire Survivor who has engaged in this proceeding as a
6 Pro Se party to promote and collaborate with core parties in good-faith towards a plan that provides a
7 restructured PG&E oriented towards safe and reliable service as well as just settlements for all
8 claimants.
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10 2. I submit this declaration in support of this Motion (the “**Motion to Shorten**”),
11 pursuant to Rule 9006-1 of the Bankruptcy Local Rules for United States District Court for the
12 Northern District of California (the “Bankruptcy Local Rules”), for entry of an order shortening time
13 for a hearing on Wednesday, May 6, 2020 at 10:00 a.m. (prevailing Pacific Time), on the *WILLIAM*
14 *B. ABRAMS MOTION TO DESIGNATE IMPROPERLY SOLICITED VOTES PURSUANT TO 11*
15 *U.S.C. §§ 1125(B) AND 1126(E) AND BANKRUPTCY RULE 2019* (the “**Motion to Designate**
16 **Votes**”), filed contemporaneously herewith.¹ William B. Abrams requests that any responses or
17 objections to the Motion to Designate Votes be in writing and filed with the Court and served by 4:00
18 p.m. (prevailing Pacific Time) on Monday, May 4, 2020.

19 3. I believe that approval of the Motion to Designate Votes as described therein is
20 particularly time-sensitive, given the ongoing victim vote solicitation and the current stage of these
21 Chapter 11 Cases. As described in the Motion to Designate Votes, Joinders filed by other parties to
22 this proceeding and within the Motion to Shorten Time, there is ample evidence that there are
23 violations of U.S.C. §§ 1125(B) and 1126(E) and bankruptcy rule 2019. To whatever extent there is
24 uncertainty and disputes regarding these violations, these differences need to be resolved quickly to
25 ensure the integrity of the voting process and the timely confirmation of the Plan by June 30, 2020 set
26 by AB 1054.

27 ¹ Capitalized terms used but not defined herein have the meanings ascribed to them in the Motion to Designate
28 Votes or the Motion to Shorten, as applicable.

1 4. I believe that prompt resolutions of these violations are in the best interest of all
2 parties on the road to an approved plan and just settlements for claimants. I believe that the
3 timeframe stipulated in the Motion to Shorten provides adequate time for all parties to file objections
4 and to have substantive oral arguments on May 6, 2020. Certain parties in this proceeding have
5 already filed joinders, objections and responses which should help to expedite this process.

6 5. As set forth in the Motion to Shorten and because the Motion to Designate Votes and
7 associated Joinders go to the heart of the integrity of the plan and the vote solicitation process, that
8 could otherwise derail confirmation and recoveries to Fire Victims under the Plan, a prompt hearing
9 on the Motion is warranted and appropriate. I have put forward the Motion to Designate Votes in
10 good-faith to remedy these issues for all parties and in particular for PG&E Fire Victims who deserve
11 a fair, prompt and just resolution pursuant to U.S.C. §§ 1125(B) and 1126(E) and Bankruptcy rule
12 2019.

13 I declare under penalty of perjury that, to the best of my knowledge and after
14 reasonable inquiry, the foregoing is true and correct and that this declaration was executed at Santa
15 Rosa, California on April 27, 2020.

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William B. Abrams
Claimant